



BUREAU OF WATER PROTECTION AND LAND REUSE  
OFFICE OF THE SUPERINTENDENT

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Department of Environmental Protection: Proposed Stream Flow Standards  
and Regulations  
Public Noticed in the Connecticut Law Journal on October 13, 2009

February 2, 2010

Paul E. Stacey  
Department of Environmental Protection  
Bureau of Water Protection and Land Reuse  
Planning & Standards Division  
79 Elm Street  
Hartford, CT 06106-5127

Dear Mr. Stacey,

My name is Brett Chapin. I am the golf course superintendent at The Redding Country Club, located in upper Fairfield County. I believe that the current Proposed Stream Flow Standards and Regulations are well intentioned, and agree that there are a small number of water bodies in the state in dire need of reclamation and protection. I grew up in Washington, CT, watching my father, Alan Chapin, First Selectman, fight in a battle with the City of Waterbury, over the health of the Shepaug River. I sat through two talks in the last month that cites this specific lawsuit as a foundation for requiring change. I cannot agree more, but golf courses are stewards of the environment. We protect water, we treat it with respect, and the less water we use, the better we are at our jobs, but we have to have the ability to water when necessary.

In my three years as golf course superintendent I have decreased water usage by 25% percent. It is in every golf course's best interest to conserve water and we have worked closely with the DEP to develop the "Best Management Practices for Golf Course Water Use." The water used on golf courses is an excellent investment in both economic and environmental terms. The Redding Country Club is the highest tax payer in Redding. We are also the largest employer in town. When effectively irrigated, healthy turf grass provides numerous environmental benefits including:

- Production of oxygen (carbon dioxide exchange) which cools the atmosphere;
- Prevents soil erosion;
- Filters natural and synthetic contaminants from rainfall; and
- Recharges critical groundwater supplies.



Golf Courses actually serve as "catch basins" for rainwater and residential/industrial runoff. In the driest of years, The Redding Country Club could use 15 million gallons of water for irrigation purposes. Irrigation practices call for deep, infrequent irrigation cycles. The Redding Country Club is currently in the process of a large drainage process that will eliminate runoff and collect water in two separate streams that run off of the property. By putting superficial limits on daily watering allotments, we are promoting light, frequent irrigation which over time will promote poor root development and weaker plants that require more fertilizer, chemicals and water to sustain.

As reported at the DEP's December 21st Informational Hearing, our irrigation practices account for less than 1-percent by volume, of the registered and/or permitted water diversion in the state. It has also been reported that less than .4-percent of the State's water bodies are considered "at risk". I ask that DEP reconsider the process. I feel it would be more sensible to classify first and complete a comprehensive economic impact study in partnership with the small business stakeholders. The proposed regulations should be narrowed to focus on the .4-percent of water bodies that are "at risk" rather than attempt to apply a broad standard to bodies of water that aren't in any danger.

I specifically ask that DEP exempt golf courses from this proposed regulation, pursuant to the updating, clarification, and implementation of the "Best Management Practices for Golf Course Water Use" by all golf courses in the state. We feel that through new technologies and best management practices, the majority of golf courses are already achieving the results the department is seeking in this regulation.

Thank you for the opportunity to comment, we look forward to continuing our conversation on this important matter.

Sincerely,

Brett Chapin  
Golf Course Superintendent  
The Redding Country Club  
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